

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:
TRUSTEES OF CONNEAUT LAKE PARK,	: BANKRUPTCY NO. 14-11277 JAD
INC.,	:
Debtor.	: THE HONORABLE JEFFERY A. DELLER
	:
TRUSTEES OF CONNEAUT LAKE PARK, INC.	: CHAPTER 11
and THE UNOFFICIAL (AD HOC)	:
COMMITTEE OF REAL ESTATE TAX	: RELATED TO DOCUMENT NOS. 330, 331, 332,
CREDITORS OF TRUSTEES OF CONNEAUT	: 335, 338 and 399
LAKE PARK, INC.,	:
Movants,	: DATE & TIME OF HEARING:
	:
vs.	: MAY 3, 2016 @ 10:00 A.M.
	:
No Respondent.	: OBJECTION/RESPONSE DATE
	:
	: APRIL 26, 2016

**JOINT MOTION FOR CANCELLATION OF ANSWER**  
**DEADLINE FOR OBJECTIONS TO DISCLOSURE STATEMENT**  
**AND DISCLOSURE STATEMENT HEARING AND REQUEST FOR**  
**ADDITIONAL TIME TO FILE JOINT PLAN**

AND NOW comes the Debtor, Trustees of Conneaut Lake Park, Inc. (hereinafter "Debtor"), by and through its counsel, George T. Snyder, and The Unofficial (Ad Hoc) Committee of Real Estate Tax Creditors of Trustees of Conneaut Lake Park (hereinafter "Committee"), by and through its counsel, Lawrence C. Bolla, and files the following:

1. On Thursday, April 21, 2016, the Debtor and the Committee, through the assistance of Norman Gilkey, Court-Appointed Mediator, arrived at an agreement to submit a joint consensual disclosure statement and plan of reorganization.
2. Accordingly, the Debtor and the Committee request that the Court:
  - a. Cancel the deadline for filing objections to the parties' pending/competing disclosure statements currently set for April 26, 2016;

- b. Cancel the hearing scheduled for May 3, 2016 regarding approval of the pending/competing disclosure statements; and
- c. Grant the Debtor and the Committee an additional thirty (30) days to file a joint consensual disclosure statement and plan of reorganization.

WHEREFORE, the Debtor and the Committee would request an order accordingly.

Respectfully submitted,

STONECIPHER LAW FIRM

QUINN, BUSECK, LEEMHUIS, TOOHEY  
& KROTO, INC.

By /s/ George T. Snyder  
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